

The Honorable Thomas S. Zilly

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

ANDREW HEDDEN, et al.,

NO. C05-0999 TSZ

v. Plaintiffs,

**NOTICE OF DEPOSITION AND  
SUBPOENA DUCES TECUM TO  
MACKENZIE HAMILTON**

## CITY OF SEATTLE, et al.,

## Defendants.

To: Mackenzie Hamilton  
c/o Paul Richmond  
Law Office of Paul Richmond  
600 First Avenue, Suite 331  
Seattle, WA 98104

YOU ARE HEREBY COMMANDED to be and appear at the offices of STAFFORD FREY COOPER, 3100 Two Union Square, 601 Union Street, Seattle, Washington 98101 on Wednesday, November 15, 2006, at 9:00 a.m., then and there to give testimony upon oral examination at the request of the defendants in the above-entitled cause, and to remain in attendance upon the undersigned or other Notary Public until discharged.

YOU ARE FURTHER COMMANDED to bring with you at said time and place the following documents or tangible things:

**NOTICE OF DEPOSITION AND SUBPOENA DUCES  
TECUM TO MACKENZIE HAMILTON - 1**

C05-0999 TSZ

3019-027230 121162

# STAFFORD FREY COOPER

PROFESSIONAL CORPORATION

601 Union Street, Suite 3100

Seattle WA 98101.1374

TEL 206.623.9900 FAX 206.624.6885

- 1        1. All diaries, documents, e-mails, and written notes that reflect your  
          observations of the demonstration events.<sup>1</sup>
- 2        2. All photographs, audio recordings, video recordings, or other media taken  
          by you of the demonstration events.
- 3        3. A copy of the flyers you handed out during the demonstration.
- 4        4. All evidence gathered at the scene of the demonstration, including but not  
          limited to physical evidence of "non-lethal" weaponry.
- 5        5. All documents, materials, and/or written communications exchanged  
          between you and the plaintiffs or other demonstrators before and during  
          the demonstration.
- 6        6. All documents related to the permitting process for the demonstration.

9           **HEREIN FAIL NOT AT YOUR PERIL.**

11           DATED this 7<sup>th</sup> day of November, 2006.

12           STAFFORD FREY COOPER

13           By: /s/ Darrin E. Bailey via ECF

14           Ted Buck, WSBA #22029  
15           Krista S. Mirhoseini, WSBA #22134  
16           Darrin E. Bailey, WSBA #34955  
17           Attorneys for Defendant City of Seattle  
18           Stafford Frey Cooper  
19           601 Union Street, Suite 3100  
20           Seattle, WA 98101-1374  
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23           [TBuck@StaffordFrey.com](mailto:TBuck@StaffordFrey.com)  
          [KMirhoseini@StaffordFrey.com](mailto:KMirhoseini@StaffordFrey.com)  
          [DBailey@StaffordFrey.com](mailto:DBailey@StaffordFrey.com)

<sup>1</sup> Demonstration refers to the demonstration that occurred in Seattle, Washington on June 2, 2003, as referenced in your Complaint.

NOTICE OF DEPOSITION AND SUBPOENA DUCES  
TECUM TO MACKENZIE HAMILTON - 2

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3019-027230 121162

**STAFFORD FREY COOPER**

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Seattle WA 98101.1374

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## Certificate of Service

I certify that on the date noted below I electronically filed this document entitled Notice of Deposition and Subpoena Duces Tecum to MACKENZIE HAMILTON with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following persons:

Kristofer J. Bundy, 19840  
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FAX: (425) 255-5474  
*Attorneys for Defendant Renton  
Police Department*

DATED this 7<sup>th</sup> day of November, 2006, at Seattle, Washington.  
**STAFFORD FREY COOPER**

By: /s/ Darrin E. Bailey via ECF

Darrin E. Bailey, WSBA #34955  
Attorneys for Defendant  
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**NOTICE OF DEPOSITION AND SUBPOENA DUCES  
TECUM TO MACKENZIE HAMILTON - 3**

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## STAFFORD FREY COOPER

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